

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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AURELIUS CAPITAL MASTER, LTD.;	:
ACP MASTER, LTD.; AURELIUS	:
OPPORTUNITIES FUND, LLC; 683	:
CAPITAL PARTNERS, LP; ADONA LLC;	:
EGOZ I LLC; EGOZ II LLC; MASTERGEN,	:
LLC; ERYTHRINA, LLC; AP 2016 1, LLC;	:
AP 2014 3A, LLC; AP 2014 2, LLC; WASO	:
HOLDING CORPORATION; TWO SEAS	:
GLOBAL (MASTER) FUND LP; VIRTUAL	:
EMERALD INTERNATIONAL LTD.; and	:
THE BANK OF NEW YORK MELLON,	:
solely in its capacity as Trustee,	:
	:
Plaintiffs,	:
	:
v.	:
	:
THE REPUBLIC OF ARGENTINA,	:
	:
Defendant.	:
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Case No.: 1:23-CV-10838 (LAP)

STIPULATION AND ~~[PROPOSED]~~ ORDER

Plaintiffs Aurelius Capital Master, Ltd., ACP Master, Ltd., Aurelius Opportunities Fund, LLC, 683 Capital Partners, LP, Adona LLC, Egoz I LLC, Egoz II LLC, Mastergen, LLC, Erythrina, LLC, AP 2016 1, LLC, AP 2014 3A, LLC, AP 2014 2, LLC, WASO Holding Corporation, Two Seas Global (Master) Fund LP, Virtual Emerald International Ltd., and The Bank of New York Mellon, solely in its capacity as Trustee (together, "Plaintiffs"), and Defendant The Republic of Argentina (the "Republic"), through their respective counsel, hereby stipulate and agree as follows:

WHEREAS, pursuant to a Stipulation and Order dated October 21, 2024 (ECF No. 33, the “October 21 Order”), Plaintiffs filed their Amended Complaint in this action (ECF No. 34) on October 22, 2024; and

WHEREAS, pursuant to the October 21 Order, the Republic’s answer or motion to dismiss with respect to the Amended Complaint is due on December 23, 2024;

IT IS HEREBY STIPULATED AND AGREED BY AND BETWEEN the undersigned counsel as follows:

1. If the Republic moves to dismiss the Amended Complaint:
 - a. Plaintiffs shall file any papers in opposition to the Republic’s motion to dismiss on or before March 17, 2025; and
 - b. The Republic shall file any reply papers in further support of its motion to dismiss on or before April 29, 2025.
2. The Republic does not waive and expressly retains all defenses and objections to the Complaint, except for defenses and objections based on a defect in service of process in this action. The defenses and objections that the Republic retains include but are not limited to defenses and objections related to (i) any applicable statutes of limitation or prescription periods, and (ii) any other challenge to the legal sufficiency of Plaintiffs’ claims.

Dated: November 18, 2024

/s/ Robert J. Giuffra, Jr.

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Ltd., ACP Master, Ltd., Aurelius Opportunity
Fund LLC, and Plaintiff The Bank of New York
Mellon, solely in its capacity as Trustee*

/s/ Matthew S. Salerno

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3A, LLC, AP 2014 2, LLC, WASO Holding
Corporation, Two Seas Global (Master)
Fund LP, and Virtual Emerald
International Ltd.*

/s/ Matthew M. Riccardi

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Counsel for Plaintiff 683 Capital Partners, LP

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

11/19/24

IT IS SO ORDERED, this ____ day of November, 2024:

Hon. Loretta A. Preska
United States District Judge

Writings of

James M. Smith, Jr.
James M. Smith, Jr.